

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MADELEINE F. SHATTENKIRK, individually  
and on behalf of all others similarly situated,

Plaintiff,

v.

ALASKA AIRLINES, INC., a Delaware  
corporation,

Defendant.

No. C19-01656 RSL

**JOINT STATUS REPORT**

Plaintiff Madeleine F. Shattenkirk (“Plaintiff”) and Defendant Alaska Airlines, Inc. (“Defendant”) (collectively, the “Parties”), by and through their respective undersigned counsel, respectfully file this joint status report as directed by the Court in its March 20, 2020 order staying this action. ECF No. 37.

On March 19, 2020, the Parties jointly moved to stay this action pending ongoing negotiations of a global settlement of this and nine other similar actions involving airline and rail carriers. ECF No. 35. As explained in that motion, the negotiating parties contemplate submission of the global settlement for approval under Rule 23(e) in *Dolan v. JetBlue Airways Corp.*, No. 0:18-cv-62193-RS (S.D. Fla.). Final approval of the class settlement in *Dolan* would result in the dismissal of this action.

1 Since then, the COVID-19 pandemic has caused extensive disruption to the lives of  
 2 individuals and businesses alike. Few businesses have been more impacted by the pandemic  
 3 than those in the airline industry, which has caused immense strain on their resources, including  
 4 unprecedented demands on their in-house counsel.

5 Despite the ongoing challenges and limitations in this current environment, the Parties  
 6 have made substantial progress toward global settlement. Drafts of a proposed Stipulation of  
 7 Class Action Settlement (“Settlement Agreement”) have been prepared, reviewed, redlined, and  
 8 circulated among counsel in the respective actions. Exhibits to the Settlement Agreement (i.e.  
 9 Order Directing Notice, Notice to the Class, Claim Form, and Final Order and Judgment) have  
 10 also been drafted and are in the redline process. In addition, a Motion to Direct Notice to the  
 11 Class, under Rule 23(e)(1), has been drafted, and requests for proposals to several reputable  
 12 third-party settlement administrators has been sent, each of whom have returned written bids.  
 13 Ultimately a Joint Notice of Pending Settlement is contemplated to be filed in *Dolan* no later  
 14 than May 20, 2020.

15 Accordingly, the Parties respectfully propose to file their next status report in 40 days, a  
 16 few days after the contemplated filing date in *Dolan*.

17 DATED this 20th day of April, 2020.

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CERTIFICATE OF SERVICE

I hereby certify that on April 20, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties registered on the CM/ECF system. All other parties (if any) shall be served in accordance with the Federal Rules of Civil Procedure.

DATED at Seattle, Washington, this 20th day of April, 2020.

s/Kim D. Stephens  
Kim D. Stephens